

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

SABRINA FLOWERS,)
)
Plaintiff,)
)
vs.) Court No.: 08 C 449
)
SOUTH WESTERN MOTOR SALES, INC.,)
d/b/a TOYOTA SCION ON WESTERN AND)
SANTANDER CONSUMER USA, INC.)
d/b/a DRIVE FINANCIAL SERVICES)
)
Defendants.)

NOTICE OF MOTION

TO: Mr. Keith J. Keogh, Ltd.
 Law Offices of Keith J. Keogh, Ltd.
 227 West Monroe Street, Suite 2000
 Chicago, IL 60606

On **Tuesday, March 11, 2008**, at **10:30 a.m.**, or as soon thereafter as counsel may be heard, we shall appear before the **Honorable Judge George M. Marovich**, or any judge sitting in his stead, in Courtroom **1944-C** of the United States District Court, Northern District of Illinois, located at 219 South Dearborn Street, Chicago, Illinois, and then and there present, on behalf of Defendant, SOUTH WESTERN MOTOR SALES, INC. d/b/a TOYOTA ON WESTERN and d/b/a SCION ON WESTERN, improperly sued as SOUTH WESTERN MOTOR SALES, INC. d/b/a TOYOTA SCION ON WESTERN's *Motion to Dismiss Count I of Plaintiff's Complaint, Motion to Dismiss Count II of Plaintiff's Complaint, Motion to Dismiss Count III of Plaintiff's Complaint, and Motion to Dismiss Count IV of Plaintiff's Complaint*, a copy of which is attached hereto and hereby served upon you.

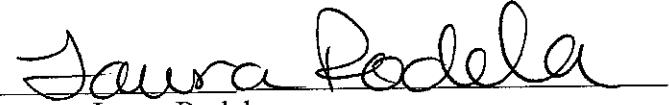
Respectfully Submitted,

/s/ Brian P. Shaughnessy
 One of the Attorneys for
 South Western Motor Sales, Inc.

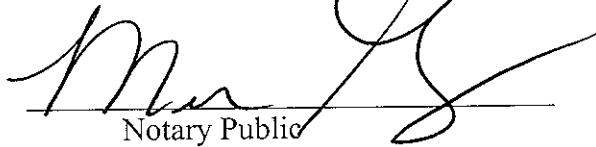
Brian P. Shaughnessy
 Jaya F. Venkataramani
 CREMER, KOPON, SHAUGHNESSY & SPINA, LLC
 Attorney for Defendant, South Western Motor Sales, Inc.
 180 North LaSalle Street, Suite 3300
 Chicago, Illinois 60601
 312/726-3800
 312/726-3818 (fax)
 ARDC No.: 03125181
 186519

CERTIFICATE OF SERVICE

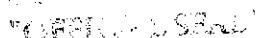
The undersigned, being first duly sworn on oath, deposes and says that she served the foregoing Notice of Motion and the document(s) referenced therein by mailing copies, via U.S. Mail, postage pre-paid, to each person identified above on the 28th day of February 2008, at Chicago, Illinois.


Laura Rodela

SUBSCRIBED and SWORN TO before
me this 28th day of February, 2008.


Notary Public

186519


MIRIAM GONZALEZ
Notary Public, State of Illinois
My Commission Expires 10/02/2011